

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TTAC Publishing, LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:20-cv-00696
)	Judge Richardson
TATC Publishing, LLC; DEC Goldman,)	Magistrate Judge Frensley
Inc.; Jonathan Hunsaker; Jeff Hays;)	
Manny Goldman; and Patrick Gentempo,)	
)	
Defendants.)	

**MOTION OF SPECIALLY-APPEARING DEFENDANT JONATHAN HUNSAKER TO
DISMISS FOR LACK OF PERSONAL JURISDICTION AND FOR IMPROPER VENUE**

Specially-appearing individual defendant Jonathan Hunsaker (“Hunsaker”) moves to dismiss this action pursuant to Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction and Federal Rule of Civil Procedure 12(b)(3) for improper venue.

No general jurisdiction over Hunsaker exists because he is a resident of Texas. Specific jurisdiction does not exist either because, importantly, all of the jurisdictional facts alleged as to purposeful availment are attributable to the corporate defendant TATC Publishing, LLC (“TATC”), not Hunsaker individually. Plaintiff TTAC Publishing, LLC has alleged no facts showing that Hunsaker, through his individual actions that are separate and apart from the conduct of TATC, purposefully availed himself of the privilege of conducting business in Tennessee such that he should be haled into court here.

Venue is also improper in the Middle District of Tennessee as alleged in the Amended Complaint. The defendants are not all Tennessee residents, a substantial part of the events giving rise to this action did not occur in the Middle District of Tennessee, and venue here is

unavailable because there are several other districts based on the allegations in the Amended Complaint in which this action may be brought.

This Motion is supported by the simultaneously-filed Memorandum, any matters subject to judicial notice, and any further submissions or arguments of counsel as may properly come before this Court.

Respectfully submitted,

/s/Robb S. Harvey

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2020, a true and exact copy of the foregoing has been served via the Electronic Case Filing system of the United States District Court for the Middle District of Tennessee, which is expected to send email notification of such filing to all counsel who have made an appearance, including the following:

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